



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

AUG 04 2014

Mr. John Cannon
Associate Director, Physical Plant
College of the Holy Cross
1 College Street
Worcester, Massachusetts 01610

Re: PCB Cleanup and Disposal Approval under 40 CFR § 761.61(a)
Fieldhouse Vault, College of the Holy Cross
Worcester, Massachusetts

Dear Mr. Cannon:

This is in response to the College of the Holy Cross (the College) Notification¹ for approval of a proposed plan to address PCB contamination at the Fieldhouse Vault located at 1 College Street, Worcester, Massachusetts. The underground utility vault along with two manholes identified as O'Neil Manhole and Drain Manhole, which are connected by conduit to the vault, are considered to be the Site. The Site contains PCB concentrations that exceed the allowable PCB levels for unrestricted use under the federal PCB regulations at 40 CFR § 761.61(a).

The College has requested an approval to clean up and dispose of the PCB-contaminated *porous surfaces* located at the Site under the PCB self-implementing cleanup and disposal option (SIDP) at 40 CFR § 761.61(a), which includes the following activities:

- Remove and dispose of *PCB remediation waste* (i.e., concrete structures, soil and sediments, drain line, and electrical conduit) as a PCB remediation waste less than ($<$) 50 parts per million (ppm) in accordance with the provisions of § 761.61(a)(5)(i)(B)(2)(ii)
- Remove and dispose of *PCB remediation waste* (i.e., floor drain pipe) as a PCB remediation waste greater than or equal to (\geq) 50 ppm in accordance with the provisions of § 761.61(a)(5)(i)(B)(2)(iii)
- Conduct verification sampling to confirm that the PCB cleanup standard of less than or equal to (\leq) 1 ppm has been met

¹ The notification was prepared by Cooperstown Environmental LLC on behalf of the College of the Holy Cross to satisfy the notification requirement under 40 CFR § 761.61(a)(3). Information was submitted dated May 8, 2014 (Self-Implementing On-Site Cleanup and Disposal Plan (SIDP)); June 16, 2014 (Response to EPA Comments); and June 30, 2014 (revised PCB Remediation Plan). These submittals shall be referred to as the "Notification".

The Notification meets the requirements and standards established under 40 CFR § 761.61(a) for cleanup and disposal of PCB waste.

The College may proceed with its project in accordance with 40 CFR § 761.61(a); its Notification; and, this Approval, subject to the conditions of Attachment 1.

Questions and correspondence regarding this Approval should be directed to:

Katherine A. Woodward, P.E., Project Manager (OSRR07-2)
United States Environmental Protection Agency
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912
Telephone: (617) 918-1353 / Facsimile: (617) 918-0353

This Approval does not release the College from any applicable requirements of federal, state or local law, including the requirements related to cleanup and disposal of PCBs or other contaminants under the Massachusetts Department of Environmental Protection (MassDEP) regulations.

EPA shall not consider this project complete until it has received all submittals required under this Approval. Please be aware that upon EPA receipt and review of the submittals, EPA may request any additional information necessary to establish that the work has been completed in accordance with 40 CFR Part 761, the Notification, and this Approval.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mary Sanderson", is written over a horizontal line.

Mary Sanderson, Chief
Remediation & Restoration II Branch

cc Richard Gang, Cooperstown Environmental.
MassDEP, Central Region
File

Attachment 1: PCB Approval Conditions

ATTACHMENT 1

**PCB CLEANUP AND DISPOSAL APPROVAL CONDITIONS
COLLEGE OF THE HOLY CROSS
FIELDHOUSE VAULT AND TWO ATTACHED DRAINS (the "Site")
1 COLLEGE STREET
WORCESTER, MASSACHUSETTS**

GENERAL CONDITIONS

1. This Approval is granted under the authority of Section 6(e) of the Toxic Substances Control Act (TSCA), 15 U.S.C. § 2605(e), and the PCB regulations at 40 CFR Part 761, and applies solely to the *PCB remediation waste* located at the Site and identified in the Notification.⁽²⁾
2. The College of the Holy Cross (the College) shall conduct on-site activities in accordance with the conditions of this Approval and with the Notification.
3. In the event that the cleanup plan described in the Notification differs from the conditions specified in this Approval, the conditions of this Approval shall govern.
4. The terms and abbreviations used herein shall have the meanings as defined in 40 CFR § 761.3 unless otherwise defined within this Approval.
5. The College must comply with all applicable federal, state and local regulations in the storage, handling, and disposal of all PCB wastes, including PCBs, PCB Items and decontamination wastes generated under this Approval. In the event of a new spill during response actions, the College shall contact EPA within 24 hours for direction on PCB cleanup and sampling requirements.
6. The College is responsible for the actions of all officers, employees, agents, contractors, subcontractors, and others who are involved in activities conducted under this Approval. If at any time the College has or receives information indicating that the College or any other person has failed, or may have failed, to comply with any provision of this Approval, it must report the information to EPA in writing within 24 hours of having or receiving the information.

² The notification was prepared by Cooperstown Environmental LLC on behalf of the College of the Holy Cross to satisfy the notification requirement under 40 CFR § 761.61(a)(3). Information was submitted dated May 8, 2014 (Self-Implementing On-Site Cleanup and Disposal Plan (SIDP)); June 16, 2014 (Response to EPA Comments); and June 30, 2014 (Revised PCB Remediation Plan). These submittals shall be referred to as the "Notification".

7. This Approval does not constitute a determination by EPA that the transporters or disposal facilities selected by the College are authorized to conduct the activities set forth in the Notification. The College is responsible for ensuring that its selected transporters and disposal facilities are authorized to conduct these activities in accordance with all applicable federal, state and local statutes and regulations.
8. This Approval does not: 1) waive or compromise EPA's enforcement and regulatory authority; 2) release the College from compliance with any applicable requirements of federal, state or local law; or 3) release the College from liability for, or otherwise resolve any violations of federal, state or local law.
9. Failure to comply with the Approval conditions specified herein shall constitute a violation of the requirement in 40 CFR § 761.50(a) to store or dispose of PCB waste in accordance with 40 CFR Part 761 Subpart D.

NOTIFICATION AND CERTIFICATION CONDITIONS

10. This Approval may be revoked if the EPA does not receive written notification from the College of its acceptance of the conditions of this Approval within 10 business days of receipt.
11. The College shall notify EPA in writing of the scheduled date of commencement of on-site activities at least one (1) business day prior to conducting any work under this Approval.
12. The College shall submit the following information for EPA review and/or approval:
 - a. a certification signed by its selected abatement/demolition contractor, stating that the contractor(s) has read and understands the Notification, and agrees to abide by the conditions specified in this Approval;
 - b. a contractor work plan, prepared and submitted by the selected demolition or abatement contractor(s) describing the containment and air monitoring that will be employed during abatement activities. This work plan should also include information on how and where wastes will be stored and disposed of, and on how field equipment will be decontaminated; and,
 - c. a certification signed by the selected analytical laboratory, stating that the laboratory has read and understands the extraction and analytical method requirements and quality assurance requirements specified in the Notification and in this Approval.

CLEANUP AND DISPOSAL CONDITIONS

13. To the maximum extent practical, engineering controls, such as barriers, and removal techniques, such as the use of HEPA ventilated tools, shall be utilized during removal processes. In addition, to the maximum extent possible, disposable equipment and materials, including PPE, will be used to reduce the amount of decontamination necessary.
14. PCB-contaminated materials shall be decontaminated and confirmatory sampling and analysis shall be conducted as described below:
 - a. The cleanup standard for *porous surfaces* (i.e., concrete) shall be less than or equal to (\leq) 1 part per million (ppm).
 - i) All post-cleanup verification sampling for *porous surfaces* (i.e., concrete) shall be performed on a bulk basis (i.e., mg/kg). Verification sampling for *porous surfaces* shall be conducted in accordance with the EPA Region 1 *Standard Operating Procedure for Sampling Porous Surfaces for Polychlorinated Biphenyls (PCBs) Revision 4*, dated May 5, 2011, at a maximum depth interval of 0.5 inches, and in accordance with the frequency requirements at Subpart O.
 - ii) Chemical extraction for PCBs shall be conducted using Methods 3500B/3540C of SW-846 for solid matrices and Method 3500B/3510C of SW-846 for aqueous matrices; and, chemical analysis for PCBs shall be conducted using Method 8082 of SW-846, unless another extraction or analytical method(s) is validated according to Subpart Q.
 - b. The cleanup standard for *bulk PCB remediation waste* (i.e., soil) shall be \leq 1 ppm.
 - i) *Bulk PCB remediation waste* samples (i.e., soil) shall be collected on a bulk basis (e.g. mg/kg) and in accordance with Subpart O. Samples shall be collected from both excavation bottoms and sidewalls.
 - ii) Chemical extraction for PCBs shall be conducted using Methods 3500B/3540C of SW-846 for solid matrices and Method 3500B/3510C of SW-846 for aqueous matrices; and, chemical analysis for PCBs shall be conducted using Method 8082 of SW-846, unless another extraction or analytical method(s) is validated according to Subpart Q.

15. PCB waste (at any concentration) generated as a result of the activities described in the Notification, excluding any decontaminated materials, shall be marked in accordance with 40 CFR § 761.40; stored in a manner consistent with 40 CFR § 761.65; and, disposed of in accordance with 40 CFR § 761.61 or § 761.62, unless otherwise specified below.
 - a. Decontamination wastes and residues shall be disposed of in accordance with 40 CFR § 761.79(g)(6).
 - b. Moveable equipment, tools, and sampling equipment shall be decontaminated in accordance with either 40 CFR § 761.79(b)(3)(i)(A), § 761.79(b)(3)(ii)(A), or § 761.79(c)(2).
 - c. PCB-contaminated water generated during decontamination shall be decontaminated in accordance with 40 CFR § 761.79(b)(1) or disposed of under § 761.60.

INSPECTION, MODIFICATION AND REVOCATION CONDITIONS

16. The College shall allow any authorized representative of the Administrator of the EPA to inspect the Site and to inspect records and take samples as may be necessary to determine compliance with the PCB regulations and this Approval. Any refusal by the College to allow such an inspection (as authorized by Section 11 of TSCA) shall be grounds for revocation of this Approval.
17. Any proposed modification(s) in the plan, specifications, or information in the Notification must be submitted to EPA no less than 14 calendar days prior to the proposed implementation of the change. Such proposed modifications will be subject to the procedures of 40 CFR § 761.61(a)(3)(ii).
18. Any departure from the conditions of this Approval without prior, written authorization from the EPA may result in the revocation, suspension and/or modification of the Approval, in addition to any other legal or equitable relief or remedy the EPA may choose to pursue.
19. Any misrepresentation or omission of any material fact in the Notification or in any records or reports may result in the EPA's revocation, suspension and/or modification of the Approval, in addition to any other legal or equitable relief or remedy the EPA may choose to pursue.

20. Approval for these activities may be revoked, modified or otherwise altered: if EPA finds a violation of the conditions of this Approval or of 40 CFR Part 761, including EPA's PCB Spill Cleanup Policy, or other applicable rules and regulations; or, if EPA finds that these activities to be conducted under this Approval present an unreasonable risk to public health or the environment.

RECORDKEEPING AND REPORTING CONDITIONS

21. The College shall prepare and maintain all records and documents required by 40 CFR Part 761, including but not limited to the records required under Subparts J and K. A written record of the cleanup and disposal and the analytical sampling shall be established and maintained by the College in one centralized location, until such time as EPA approves in writing a request for an alternative disposition of such records. All records shall be made available for inspection to authorized representatives of EPA.
22. The College shall submit a final report as both a hard copy and electronic format, to the EPA within 60 days of completion of the activities authorized under this Approval. At a minimum, this final report shall include: a short narrative of the project activities with photo-documentation; characterization and confirmation sampling analytical results; copies of the accompanying analytical chains of custody; field and laboratory quality control/quality assurance checks; an estimate of the quantity of PCB waste disposed of and the size of the PCB cleanup area(s); copies of manifests and bills of lading; and copies of certificates of disposal or similar certifications issued by the disposer.
23. Required submittals shall be mailed to:

Katherine A. Woodward, P.E., Project Manager
United States Environmental Protection Agency
5 Post Office Square, Suite 100 – (OSRR07-2)
Boston, Massachusetts 02109-3912
Telephone: (617) 918-1353
Facsimile: (617) 918-0353
24. No record, report or communication required under this Approval shall qualify as a self-audit or voluntary disclosure under EPA audit, self-disclosure or penalty policies.

END OF ATTACHMENT 1